Virginia Title V Operating Permit

Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-305 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name: Volvo Trucks North America, Inc. Facility Name: Volvo Trucks North America, Inc. Facility Location: State Route 643 in Pulaski County near

Dublin, Virginia

Registration Number: 20765

AIRS Number: 51-155-0041 Permit Number: VA-20765

Effective Date: June 1, 2002 Modified Date: June 23, 2003 Expiration Date: May 31, 2007

Robert G. Burnley

Director, Department of Environmental Quality

Original Permit Signature Date: May 1, 2002 Modified Permit Signature Date: June 23, 2003

Table of Contents, 2 pages Permit Document 42 pages

Table of Contents

I. F	FACILITY INFORMATION	4
II. F	EMISSION UNITS	5
III.	FUEL BURNING EQUIPMENT REQUIREMENTS	9
A.	LIMITATIONS	
A. B.	MONITORING	
C.		
D.		
E.	REPORTING	
IV.	PROCESS EQUIPMENT REQUIREMENTS	13
Α.	LIMITATIONS	13
В.	Monitoring	
C.	RECORDKEEPING	
D.	TESTING.	
E.	REPORTING	
V. F	FACILITY WIDE CONDITIONS	24
A.	LIMITATIONS	24
В.	Monitoring	
C.	RECORDKEEPING	
D.	TESTING	
E.	REPORTING	27
VI.	INSIGNIFICANT EMISSION UNITS	28
VII.	PERMIT SHIELD & STREAMLINED REQUIREMENTS	31
VIII.	GENERAL CONDITIONS	32
A.	FEDERAL ENFORCEABILITY	32
В.	PERMIT EXPIRATION	
C.	RECORDKEEPING AND REPORTING	
D.	ANNUAL COMPLIANCE CERTIFICATION	
E.	PERMIT DEVIATION REPORTING	
F.	FAILURE/MALFUNCTION REPORTING	
G.	STARTUP, SHUTDOWN, AND MALFUNCTION	
H.	MALFUNCTION AS AN AFFIRMATIVE DEFENSE	
I.	FUGITIVE DUST EMISSION STANDARDS	
J.	SEVERABILITY	
K.	DUTY TO COMPLY	
L.	NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE	
M.		
N.	PROPERTY RIGHTS	
O.	DUTY TO SUBMIT INFORMATION	
P.	DUTY TO PAY PERMIT FEES	
Q.	ALTERNATIVE OPERATING SCENARIOS	
R.	INSPECTION AND ENTRY REQUIREMENTS	

Permit Number: VA-20765

Effective Date: June 1, 2002; Revision Date: June 23, 2003

Page	3
1 45	

S.	REOPENING FOR CAUSE	. 4(
T.	PERMIT AVAILABILITY	4(
U.	TRANSFER OF PERMITS	4
V.	PERMIT REVOCATION OR TERMINATION FOR CAUSE	4
W.	DUTY TO SUPPLEMENT OR CORRECT APPLICATION	4
X.	STRATOSPHERIC OZONE PROTECTION	4
Y.	ACCIDENTAL RELEASE PREVENTION	42
Z.	CHANGES TO PERMITS FOR EMISSIONS TRADING	42
AA.	EMISSIONS TRADING	42

Page 4

I. Facility Information

Permittee

Volvo Trucks North America, Inc. 7900 National Service Road Greensboro, NC 27402

Responsible Official

Thomas C. Murphy Vice President, Manufacturing

Facility

Volvo Trucks North America, Inc. P. O. Box 1126 Dublin, VA 24084

Contact Person

Robert G. Whelen Director, Environmental & Real Estate Services 910-393-2644

Registration Number: 20765

AIRS Identification Number: 51-155-0041

Facility Description: SIC Code 3713 – Volvo Trucks North America, Inc. is a producer of heavy duty trucks located in Pulaski County on state route 643 near Dublin, Virginia. Volvo presently produces heavy duty trucks by two methods, on site assembly including painting of the entire cab, and assembly of a pre-painted cab on a chassis fabricated and painted at the facility. Under the planned expansion, Volvo anticipates a large reduction of pre-painted units with a corresponding increase of cabs assembled and painted at the facility.

The facility is a Title V major source of Volatile Organic Compounds, nitrogen oxides, carbon monoxide, and Hazardous Air Pollutants. This source is located in an attainment area for all pollutants, and is a PSD major source for VOCs. The only NSPS, MACT or NESHAP requirements which presently apply to this facility are the NSPS requirements Kb, which requires records of capacity and engineering drawings of some tanks to be retained on site, and Dc, which required notification to USEPA of the installation of a process heater in excess of 10 MMBTU/hr fueled by natural gas. A MACT for heavy truck production facilities is expected to be promulgated before the renewal date of this permit.

Page 5

II. Emission Units

Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Fuel Burning	Equipment						
1FBE-001	XXX.1	North Chasis Oven (Direct Fired)	3.0 MMBTU/hr				2/26/03
1FBE-002	NN.1	South Chasis Oven (Direct Fired)	3.0 MMBTU/hr				2/26/03
1FBE-003	WWW.1	North Chasis Air Make-Up Unit	7.56 MMBTU/hr				2/26/03
1FBE-004	MM.1-MM.6	South Chasis Air Make-Up Heater	5.44 MMBTU/hr				2/26/03
2FBE-001/ 6FBE-001	BBB.1	Phosphate Solution/Washer Heater	25.2 MMBTU/hr				2/26/03
3FBE-001	EEE.1	E-Coat Oven w/ incinerator	5** MMBTU/hr	RTO	3PC-01	VOC, Odor	2/26/03
5FBE-001	GGG.5	Primer Oven Zone 1 Burner	3.43 MMBTU/hr				2/26/03
5FBE-002	GGG.6	Primer Oven Zone 2 Burner	2.63 MMBTU/hr				2/26/03
5FBE-003	GGG.7	Primer Oven Zone 3 Burner	2.63 MMBTU/hr				2/26/03
8FBE-001	PPP.3	Multi-Tone/Basecoat Oven – Zone 1 Burner (Booth #1)	3.43 MMBTU/hr				2/26/03
8FBE-002	PPP.4	Multi-Tone/Basecoat Oven – Zone 2 Burner (Booth #1)	2.63 MMBTU/hr				2/26/03
8FBE-003	PPX.1	Multi-Tone/Basecoat Oven – RTO Incinerator Exhaust (Booth #1)	5.0 MMBTU/hr	RTO	8PC-03	VOC	2/26/03
8FBE-004	BFE.1	Multi-Tone/Basecoat Oven – Zone 1 Burner (Booth #2)	3.0 MMBTU/hr				2/26/03
8FBE-005	BFE.2	Multi-Tone/Basecoat Oven – Zone 2 Burner (Booth #2)	5.0 MMBTU/hr				2/26/03
8FBE-006	BFE.3	Multi-Tone/Basecoat Oven – Zone 3A Burner (Booth #2)	3.0 MMBTU/hr				2/26/03
8FBE-007	BFE.4	Multi-Tone/Basecoat Oven – Zone 3B Burner (Booth #2)	3.0 MMBTU/hr				2/26/03

Permit Number: VA-20765

Effective Date: June 1, 2002; Revision Date: June 23, 2003

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
8FBE-008	PPX.3	Multi-Tone/Basecoat Oven – RTO Incinerator Exhaust (Booth #2)	5.0 MMBTU/hr	RTO	8PC-05	VOC	2/26/03
9FBE-001	SSS.3	Clearcoat Oven Zone 1	3.43 MMBTU/hr				2/26/03
9FBE-002	SSS.4	Clearcoat Oven Zone 2	2.6 MMBTU/hr				2/26/03
9FBE-003	SSS.6	Clearcoat Oven Zone 3	4.2 MMBTU/hr				2/26/03
12FBE-001	SSS.1&2, MMM.1, GGG.1&2	Central Air Make-Up Heater	56.2 MMBTU/hr				2/26/03
12FBE-002	building air	Make-Up Air Unit # 1 South	8.0 mmbtu/hr				2/26/03
12FBE-003	building air	Make-Up Air Unit # 2 South	9.5 MMBTU/hr				2/26/03
13FBE-001	P.1 - P.6	Truck Repair Oven Exhaust (001)	2.39 MMBTU/hr				2/26/03
13FBE-002	P.5 & P.6	Supply Air Heater – 13PE-001	6.48 MMBTU/hr				2/26/03
13FBE-003	O.1&2	Air Make-Up Heater - 13PE-002	3.89 MMBTU/hr				2/26/03
13FBE-003A	0.3	Air Make-Up Heater - 13PE-002A	3.89 MMBTU/hr				2/26/03
13FBE-004	AAX.1-4	Air Make-Up Heater – 13PE-003	5.21 MMBTU/hr				2/26/03
13FBE-005	Q.1 – Q.4	Air Make-Up Heater – 13PE004	4.68 MMBTU/hr				2/26/03
13FBE-005A	Q.5	Air Make-Up Heater – 13PE004A	4.68 MMBTU/hr				2/26/03
13FBE-006	(indoor vent)	PC Building Heater	0.5 MMBTU/hr				2/26/03
14FBE-001	BBB.2	Burnham Industries Boiler – Humidity Control for 8PE-002	6.3 MMBTU/hr				2/26/03
15FBE-001	PPX.1&2 PPP.1&2	Make-Up Air Unit for Multi-Tone/ Basecoat Booth #1 (8PE-001)	23.5 MMBTU/hr				2/26/03
16FBE-001	PPX.3, PPX.4	Make-Up Air Unit for Multi-Tone/ Basecoat Booth #2 (8PE-002)	12.2 MMBTU/hr				2/26/03
Heavy Truck	Manufacturing	Process					
1PE-001	MM.1-7	South Chasis Paint Booth		Water Curtain	1PC-01	PM10, TSP	2/26/03
1PE-001A	NN.1	South Chasis Curing Oven					2/26/03
1PE-001B	00.1	South Chasis Oven Cooler					2/26/03
1PE-002	WWW.1	North Chasis Paint Booth		Venturi Scrubber	1PC-02	PM10, TSP	2/26/03

Permit Number: VA-20765

Effective Date: June 1, 2002; Revision Date: June 23, 2003

1PE-002A	XXX.1	North Chasis Curing Oven					2/26/03
Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
1PE-002B	YYY.1	North Chasis Oven Cooler					2/26/03
2PE-001	AAA.1&2,	Phosphate System					2/26/03
3PE-001	No stack	E-Coat Process					2/26/03
3PE-001A	CCC.1	E-Coat Tunnel					2/26/03
3PE-001B	EEE.1	E-Coat Oven					2/26/03
3PE-001C	DDD.1	E-Coat Oven Cooler					2/26/03
3PE-001D	FFF.2	E-Coat Scuff Station					2/26/03
4PE-001	(no stack)	Seam Sealer/Bracket Attach					2/26/03
4PE-001A	(no stack)	Cab Wipe/Prime Tack-Off					2/26/03
5PE-001	GGG.2	Primer Process – Manual Zone					2/26/03
5PE-001A	GGG.1	Primer Process – Robotic Zone		Venturi Scrubber	5PC-02	PM10, TSP	2/26/03
5PE-001B	GGG.8	Primer Oven Exhaust					2/26/03
5PE-001C	GGG.3	Primer Oven Cooler					2/26/03
6PE-001	JJJ.1	Prep Booth/Sand Booth					2/26/03
6PE-001A	WWE.1	Washing Process					2/26/03
6PE-001B	LLL.1	Dry-Off Area					
7PE-001	MMM.1	Specialty/Touch-Up Painting – Waterborne & High Solids		Venturi Scrubber	7PC-01	PM10, TSP	2/26/03
8PE-001	PPX.1&2 (PPP.1&2 bypasses)	Multi-Tone/Basecoat Booth # 1 Waterborne & High Solids Coating		Venturi Scrubber, Cartridge Filter, Zeolite Concentrator/ VOC Incinerator	8PC-01, 8PC-02A, 8PC-02, 8PC-03	PM10, TSP, VOC	2/26/03
8PE-001A	PPP.5	Multi-Tone/Basecoat Oven # 1					2/26/03
8PE-001B	PPP.6	Multi-Tone/Basecoat Cooler # 1					2/26/03
8PE-002	PPX.3 (PPX.4 bypass)	Multi-Tone/Basecoat Booth # 2 Waterborne & High Solids Coating		Venturi Scrubber, RTO	8PC-04, 8PC-05	PM10, TSP, VOC	2/26/03
8PE-002A	BOE.1	Multi-Tone/Basecoat Oven # 2					2/26/03
8PE-002B	QQQ.4	Multi-Tone/Basecoat Cooler # 2					2/26/03
8PE-002C	RRR.1	Multi-Tone/Basecoat Booth # 2					2/26/03

Permit Number: VA-20765

Effective Date: June 1, 2002; Revision Date: June 23, 2003

		Demask Station					
Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
9PE-001	SSS.1&2	Clearcoat Spray Booth		Venturi Scrubber	9PC-01	PM10, TSP	2/26/03
9PE-001A	SSS.5	Clearcoat Curing Oven					2/26/03
9PE-001B	TTT.3	Clearcoat Cooler # 1					2/26/03
9PE-001C	TTT.5	Clearcoat Cooler # 2					2/26/03
10PE-001, 10PE-002	UUU.1	Final Inspection/Spot Repair Area					2/26/03
11PE-001	VVV.1	Rust Proof		Dry Filter	11PC-01	PM10, TSP	2/26/03
13PE-001	P.1-4	PC Booth # 1: Cab Touch-Up		Water Curtain	13PC-01	PM10, TSP	2/26/03
13PE-001A	P.5 & P.6	PC Booth #1 Oven					2/26/03
13PE-002	O.1&2	PC Booth # 2: Cab Touch-Up		Dry Filter	13PC-02	PM10, TSP	2/26/03
13PE-002A	O.3	PC Booth #2 Oven					
13PE-003	AAX.1-4	PC Booth # 3: Chasis Touch-Up		Dry Filter	13PC-03	PM10, TSP	2/26/03
13PE-004	Q.1-4	PC Booth # 4: Truck Touch-Up		Dry Filter	13PC-04	PM10, TSP	2/26/03
13PE-004A	Q.5	PC Booth #4 Oven					
13PE-005	pending	PC Booth # 5: Truck Touch-Up		Dry Filter	13PC-05	PM10, TSP	2/26/03

^{*}The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

^{**} Based on maximum heat input of RTO

Page 9

III. Fuel Burning Equipment Requirements

A. Limitations

- 1. **Fuel** The approved fuels for the all stationary fuel burning equipment, including central air system, ovens, incinerators, and make-up heaters are natural gas and propane. A change in the fuel may require a permit to modify and operate. (9 VAC 5-80-110, 9 VAC 5-80-10 and Condition 19 of 2/26/03 Permit)
- 2. **Fuel Throughput** The facility as a whole shall consume no more than 1,927 x 10⁶ standard cubic feet of natural gas per year, calculated monthly as the sum of each consecutive 12 month period.

(9 VAC 5-80-110, 9 VAC 5-80-10 and Condition 20 of 2/26/03 Permit)

3. **Emission Limits** - Emissions from the combined operation of all stationary fuel burning equipment, including the central air system and all incinerators, ovens, and make-up heaters shall not exceed the limits specified below:

PM-10 6.96 tons/yr

Nitrogen Oxides (as NO₂) 91.64 tons/yr

Carbon Monoxide 76.98 tons/yr

Volatile Organic 5.04 tons/yr

Compounds

Annual emissions calculated monthly as the sum of the previous consecutive twelve month period.

These limits are included for emission inventory purposes and based on USEPA emission factors and fuel throughputs (based on a 1927 million scf/yr maximum natural gas usage rate).

(9 VAC 5-80-110, 9VAC 5-50-260, 9 VAC 5-80-110, and Condition 23 of 2/26/03 Permit)

4. **Visible Emission Limit** - Visible Emissions from all stationary fuel burning equipment, including the central air system and all incinerators, ovens, and make-up heaters shall not exceed five (5) percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed ten (10) percent opacity. (9 VAC 5-50-80, 9 VAC 5-80-110, 9 VAC 5-80-110 and Condition 25 of 2/26/03 Permit)

Effective Date: June 1, 2002; Revision Date: June 23, 2003

Page 10

5. **Requirements by Reference** - Permittee is subject to all applicable provisions of 40 CFR 60.40c to 60.48c [NSPS Dc] for the Phosphate System washing heater, 6FBE-001. At the time of issuance of this permit, applicable requirements concern only proper notifications at the time of the start up of the phosphate system washing heater.

(9 VAC 5-80-110 and Condition 5 of 2/26/03 Permit)

6. **Operation and Maintenance** – Boiler (6FBE-001, 14FBE-001), HVAC System (12FBE-001,002, & 003), and Air Make-Up Unit (13FBE-001 through 006, 15FBE-001, & 16FBE-001) emissions shall be controlled by proper operation and maintenance. Boiler operators shall be trained in the proper operation of all such equipment. Training shall consist of a review and familiarization of the manufacturer's operating instructions, at minimum. (9 VAC 5-80-110 and 9 VAC 5-80-110)

B. Monitoring

- 1. **Operation & Maintenance Procedures** The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to the boilers (6FBE-001 & 14FBE-001):
 - a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance for the boilers (6FBE-001 & 14FBE-001).
 - b. Develop an inspection schedule, monthly at a minimum, to insure operational integrity of the boilers (6FBE-001 & 14FBE-001) and maintain records of inspection results.
 - c. Have available written operating procedures for the boilers (6FBE-001 & 14FBE-001). These procedures shall be based on the manufacturer's recommendations, at a minimum, if such recommendations exist.
 - d. Train operators in the proper operation of the boilers (6FBE-001 & 14FBE-001) and familiarize the operators with the written operating procedures.

Records of maintenance, inspections and training shall be maintained on site for a period of five (5) years and shall be made available to DEQ personnel upon request. (9 VAC 5-80-110, 9 VAC 5-80-110 F & K, 9 VAC 5-40-20E, 9 VAC 5-50-20 E)

Page 11

C. Recordkeeping

- 1. On Site Records The permittee shall develop a database record keeping system, or equivalent methodology acceptable to the Department, to maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, West Central Regional Office. These records shall include, but are not limited to:
 - a. The monthly and annual consumption of natural gas and propane for the total plant. The annual consumption shall be calculated monthly as the sum of each consecutive twelve (12) month period.
 - b. The daily, monthly, and annual consumption of natural gas and propane for the Phosphate System washing heater (2FBE-001). The annual consumption shall be calculated monthly as the sum of each consecutive twelve (12) month period.
 - c. Monthly and annual emissions from combustion of natural gas and propane of nitrogen oxides, carbon monoxide, volatile organic compounds and PM-10, for the total plant. Annual emissions shall be calculated monthly as the sum of the previous consecutive 12 month period.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years. (9 VAC 5-50-50, 9 VAC 5-80-110, and Condition 26 of 2/26/03 Permit)

D. Testing

- 1. **Testing/Monitoring Ports** The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations. (9 VAC 5-50-30, 9 VAC 5-80-110, and Condition 32 of 2/26/03 Permit)
- 2. **Test Methods** If testing to demonstrate compliance is conducted in addition to the monitoring specified in this permit, the permittee shall use the following methods in accordance with procedures approved by the DEQ as follows:

Page 12

Pollutant	Test Method (40 CFR Part 60, Appendix A)
VOC	EPA Methods 18, 25, 25a or other method approved by DEQ
VOC Content	EPA Methods 24, 24a or other method approved by DEQ
NO_x	EPA Method 7 or other method approved by DEQ
CO	EPA Method 10 or other method approved by DEQ
PM/PM-10	EPA Method 5, 17 or other method approved by DEQ
Visible Emission	EPA Method 9

(9 VAC 5-80-110)

E. Reporting

The reporting requirements for this section are satisfied by the recordkeeping requirements in this section and the General Conditions section.

Page 13

IV. Process Equipment Requirements

A. Limitations

1. **Emission Controls and Control Efficiency** - Particulate emissions from paint spray booths shall be controlled as tabulated below, or DEQ approved equivalent:

		Minimum
Paint/Coating Process	Control Equipment	Efficiency
Chasis 1PE-001	Water Wash Spray Booth	92%
Chasis 1PE-002	Venturi Wet Scrubber	98.5%
Cab Prime 5PE-001	Venturi Wet Scrubber	98.5%
Special Projects 7PE-001	Venturi Wet Scrubber	98.5%
Cab Basecoat & Multi-Tone 8PE-001	Venturi Wet Scrubber &	98.5% ^a
	3 Stage Dry Filters	99.5% ^b
Cab Basecoat & Multi-Tone 8PE-002	Venturi Wet Scrubber	98.5%
Cab Clearcoat 9PE-001	Venturi Wet Scrubber	98.5%
Rustproofing 11PE-001	Dry Filter	97%
P-C Cab Repair/Touch-Up 13PE-001	Water Wash Spray Booth	85%*
P-C Cab Repair/Touch-Up 13PE-002	Cartridge Filter	96%*
P-C Chasis Repair/Touch-Up 13PE-003	Cartridge Filter	99%*
P-C Cab Repair/Touch-Up 13PE-004	Dry Filter or equivalent	96%*
P-C Cab Repair/Touch-Up 13PE-005	Dry Filter or equivalent	96%*

The over-spray particulate controls for the paint spray booths shall be provided with adequate access for inspection.

Particulate emissions of 3 grains per 1000 scf shall be considered equivalent to 98.5% control for Venturi Wet Scrubbers.

*Since low inlet loading is frequent in the P-C area, particulate emission of less than 0.005 grains per dry standard cubic foot shall be considered compliance with the above control limits.

^aUsing Venturi Wet Scrubber only when bypassing the zeolite concentrator, as permitted under Condition 10 of this section.

^bCombined efficiency of Venturi and 3-stage filters. (9 VAC 5-80-110, 9 VAC 5-80-10 H, 9 VAC 5-50-260, and Condition 6 of 2/26/03 Permit)

Effective Date: June 1, 2002; Revision Date: June 23, 2003

Page 14

2. **Emission Controls** - Volatile organic compound (VOC) emissions from the following painting/coating processes shall be controlled by the use of waterborne and/or high-solids coatings, or DEQ approved equivalent:

- Chassis 1PE-001 - Chasis 1PE-002

- Clearcoat 9PE-001 - Rustproof/Sound Deadener 11PE-001

(9 VAC 5-80-110, 9 VAC 5-50-260, and Condition 7 of 2/26/03 Permit)

3. **Emission Controls** - Volatile organic compound (VOC) emissions from the cab prime process 5PE-001 shall be controlled by the use of waterborne coatings or DEQ approved equivalent.

(9 VAC 5-80-110, 9 VAC 5-50-260, and Condition 8 of 2/26/03 Permit)

4. **Emission Controls** - Volatile organic compound (VOC) emissions from the electrodeposition (E-coat immersion) process 3PE-001 shall be controlled by the use of electrodeposited waterborne coatings.

(9 VAC 5-80-110, 9 VAC 5-50-260, and Condition 9 of 2/26/03 Permit)

5. Emission Controls and Control Efficiency - Volatile organic compound (VOC) emissions from the E-Coat Oven (3FBE-001) shall be controlled by incineration. The incinerator shall be provided with adequate access for inspection. During coating operations, the minimum chamber temperature shall be maintained at 1400EF with a minimum 0.5 second retention time, or alternatively be maintained at a lower minimum operating temperature determined by emissions testing to achieve a 95% destruction of volatile organic compounds emissions from the process, or alternatively operate at conditions that emit no more than 0.17 lb/hr volatile organic compounds as determined by emissions testing.

(9 VAC 5-80-110, 9 VAC 5-80-10 H, and Condition 10 of 2/26/03 Permit)

6. **Emission Controls and Control Efficiency** - Volatile organic compound (VOC) emissions from the Basecoat/Multi-Tone Spray Booth 8PE-001 shall be controlled by a zeolite VOC adsorption followed by a thermal VOC fume incinerator with a minimum incinerator VOC destruction efficiency of 95%. The concentrators and incinerator shall be provided with adequate access for inspection.

During operation of this painting process, the minimum incinerator chamber temperature shall be maintained at 1400EF with a minimum 0.5 second retention time, or maintained at a minimum operating temperature determined by emissions testing necessary to achieve an overall 90 percent destruction of volatile organic compounds entering the concentrator portion of the control system and 95 percent destruction of volatile organic compounds entering the incinerator. The incinerator shall be equipped with automatic thermostats to maintain the required chamber temperature and with a continuous temperature sensor at or near the chamber exit to monitor, indicate, and record the chamber temperature.

Effective Date: June 1, 2002; Revision Date: June 23, 2003

Page 15

[Note: for purposes of estimating VOC emissions from Basecoat/Multi-Tone, use of control efficiencies derived from the most recent performance testing demonstrating compliance are an acceptable method, rather than using the minimum efficiencies cited above.]

(9 VAC 5-80-110, 9 VAC 5-80-10 H, 9 VAC 5-50-260, 9 VAC 5-80-110, and Condition 11 of 2/26/03 Permit)

7. Emission Controls and Control Efficiency - Volatile organic compound (VOC) emissions from the Basecoat/Multi-Tone Spray Booth 8PE-002 shall be controlled by air recirculation to concentrate VOCs inside the booth followed by a thermal VOC fume incinerator with a minimum incinerator VOC destruction efficiency of 95%. The air recirculation system and incinerator shall be provided with adequate access for inspection. During operation of this painting process, the minimum incinerator chamber temperature shall be maintained at 1400EF with a minimum 0.5 second retention time, or maintained at a minimum operating temperature determined by emissions testing necessary to achieve an overall 95 percent destruction of volatile organic compounds entering the incinerator.

[Note: for purposes of estimating VOC emissions from Basecoat/Multi-Tone, use of control efficiencies derived from the most recent performance testing demonstrating compliance are an acceptable method, rather than using the minimum efficiencies cited above.]

(9 VAC 5-80-110, 9 VAC 5-80-10 H, 9 VAC 5-50-260, and Condition 12 of 2/26/03 Permit)

- 8. **Emission Controls** Volatile organic compound emissions from painting/coating operations in spray booths not controlled by VOC incineration (spray booths other than Basecoat/Multi-Tone 8PE-001 and 8PE-002), are limited to 3.5 lbs/gal of coating as applied as a monthly facility-wide average and as a consecutive twelve (12) month average for the overall painting/coating facility. (9 VAC 5-80-110, 9 VAC 5-80-10 H, 9 VAC 5-80-110, 9 VAC 5-50-180, 9 VAC 5-50-260, and Condition13 of 2/26/03 Permit)
- 9. **Emission Controls** Reasonable precautions shall be taken to minimize volatile organic compound (VOC) emissions from cleaning and purging operations. Reasonable precautions may include the following:
 - a. The use of capture or control devices or both.
 - b. The use of detergents, high pressure water, or other non-volatile cleaning methods.
 - c. The minimization of the quantity of the volatile organic compounds used to clean lines.

Effective Date: June 1, 2002; Revision Date: June 23, 2003

Page 16

d. The adjustment of production schedules to minimize coatings changes thereby reducing the need for frequent cleaning or purging of the system.

(9 VAC 5-80-110, 9 VAC 5-40-4780 D, 9 VAC 5-40-20 E, and Condition 14 of 2/26/03 Permit)

- 10. **Alternative Emission Controls** The bypass of either the 8PE-001 zeolite concentrator and incinerator or the 8PE-002 incinerator may be utilized for maintenance of the control equipment without cessation of operations in the Basecoat/Multi-Tone 8PE-001 or 8PE-002 Spray Booths, respectively, provided that:
 - a. The exact dates and times when emissions commence and cease being routed through the bypass(es) are documented.
 - b. The VOC emissions during the bypass period are tabulated and recorded as uncontrolled emissions.
 - c. The differential air pressure reading for the venturi scrubber particulate control device is recorded at least once per hour while paint operations are ongoing.
 - d. The emissions from the bypassed operation do not violate any other conditions of this permit.
 - e. The Director, West Central Regional Office, is notified within two weeks of the bypass that this action has occurred, the duration or anticipated duration of the action, and the reason for the action.
 - f. At times when only one spray booth is bypassed, the permittee will attempt to perform all painting operations utilizing paints containing lead chromate in the spray booth which is not bypassed.

(9 VAC 5-80-110, 9 VAC 5-80-110 and Condition 15 of 2/26/03 Permit)

- 11. **Throughput** The volatile organic compound consumption for painting/coating shall not exceed 1,400 tons per year, calculated monthly as the sum of the previous consecutive twelve month period.
 - (9 VAC 5-80-110, 9 VAC 5-80-10 H, 9 VAC 5-80-110, and Condition 17 of 2/26/03 Permit)
- 12. **Throughput** The volatile organic compound consumption for painting/coating shall not exceed 233.3 tons per month.

(9 VAC 5-80-110, 9 VAC 5-80-10 H, 9 VAC 5-80-110, and Condition 18 of 2/26/03 Permit)

Permit Number: VA-20765

12.0 tons/yr

Effective Date: June 1, 2002; Revision Date: June 23, 2003

Page 17

13. **Emission Limits** - Emissions from the operation of truck painting/coating shall not exceed the limits specified below:

Volatile Organic Compounds 493.5 tons/yr

Annual emissions calculated monthly as the sum of the previous consecutive twelve month period.

(9 VAC 5-80-110, 9 VAC 5-50-260, 9 VAC 5-50-30, and Condition 21 of 2/26/03 Permit)

14. **Emission Limits** – Particulate emissions from the operation of truck painting/coating shall not exceed the limits specified below:

Chasis Spray Combined 1PE-001&002	8.5 tons/yr
Cab Prime Spray 5PE-001	4.4 tons/yr
Specialty/Touch-Up Spray 7PE-001	1.0 tons/yr
Cab Basecoat/Multi-Tone Spray 8PE-001	0.92 tons/yr
Cab Basecoat/Multi-Tone Spray 8PE-002	3.05 tons/yr
Cab Clearcoat Spray 9PE-001	7.29 tons/yr

Annual emissions calculated monthly as the sum of the previous consecutive twelve month period.

(9 VAC 5-80-110 and Condition 22 of 2/26/03 Permit)

P-C Building Spray Combined 13PE-001, 002, 003, 004, &005

15. **Visible Emission Limit** - Visible emissions from the facility's spray booths shall not exceed five (5) percent opacity, except for one six minute period in any one hour of not more than ten (10) percent, as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). The opacity standard shall apply at all times, except during periods of malfunction, start up, and shut down.

(9 VAC 5-80-110, 9 VAC 5-50-80, 9 VAC 5-80-110, and Condition 25 of 2/26/03 Permit)

Effective Date: June 1, 2002; Revision Date: June 23, 2003

Page 18

B. Monitoring

- 1. **Monitoring Devices** The E-Coat Oven (3FBE-001) incinerator shall be equipped with automatic thermostats to maintain the required chamber temperature and with a continuous temperature sensor at or near the chamber exit to indicate the chamber temperature. The devices shall be installed in an accessible location and shall be maintained by the permittee such that they are in proper working order at all times. (9 VAC 5-80-10 H, 9 VAC 5-80-110, and Condition 10 of 2/26/03 Permit)
- 2. **Monitoring Devices** The VOC fume incinerator controlling the #1 Multitone/ Basecoat Booth (8PE-001) shall be equipped with automatic thermostats to maintain the required chamber temperature and with a continuous temperature sensor at or near the chamber exit to monitor, indicate, and record the chamber temperature. The devices shall be installed in an accessible location and shall be maintained by the permittee such that they are in proper working order at all times.

 (9 VAC 5-80-10 H, 9 VAC 5-80-110, and Condition 11 of 2/26/03 Permit)
- 3. **Monitoring Devices** The zeolite VOC concentrator on the #1 Multitone/Basecoat Booth (8PE-001) shall be equipped with a VOC detection device (such as a flame ionization detector, photo ionization detector, or similar device acceptable to the Department) to monitor, indicate, and record the VOC concentration, in parts per million, in the exhaust stream from the concentrators to the ambient air. The device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times.

 (9 VAC 5-80-10 H, 9 VAC 5-80-110, and Condition 11 of 2/26/03 Permit)
- 4. **Monitoring Devices** The VOC fume incinerator controlling the #2 Multitone/Basecoat Booth (8PE-002) shall be equipped with automatic thermostats to maintain the required chamber temperature and with a continuous temperature sensor at or near the chamber exit to monitor, indicate, and record the chamber temperature. (9 VAC 5-80-10 H, 9 VAC 5-80-110, and Condition 12 of 2/26/03 Permit)
- 5. **Monitoring Devices** The 8PE-001 and 8PE-002 Multitone/Basecoat booths shall be equipped with differential pressure gauges to continuously measure the differential pressure across the Venturi wet scrubbers, the differential pressure between the spray booths and the building air outside the booth, and for 8PE-002 only, the differential pressure across the recirculation air filters. Each monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate access for inspection and shall be in operation when the spray booth is operating. (9 VAC 5-80-10 H, 9 VAC 5-80-110, and Condition 16 of 2/26/03 Permit)

Effective Date: June 1, 2002; Revision Date: June 23, 2003

Page 19

- 6. **Operation & Maintenance Procedures** The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment and process equipment which affect such emissions:
 - a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
 - b. Have available written operating procedures for the air pollution control equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
 - c. Train operators in the proper operation of all air pollution control equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.
 - d. Maintain an inventory of spare parts that are needed to maintain the air pollution control equipment in proper working order.

Records of maintenance, inspections and training shall be maintained on site for a period of five (5) years and shall be made available to DEQ personnel upon request. (9 VAC 5-80-110, 9 VAC 5-80-110 F & K, 9 VAC 5-40-20E, 9 VAC 5-50-20E)

C. Recordkeeping

On Site Records - The permittee shall develop a data base record keeping system, or equivalent methodology acceptable to the Department, to maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. VOC emissions should not include the amount of VOC that is not emitted due to VOC incineration emissions controls, VOC returned to vendor, VOC removed for off-site disposal, etc. Separate records shall be kept for each operational area, such as a spray booth and associated ovens, cooling areas, flash-off areas, etc. (Note: The PC area may be treated as a single operational area where emission records for booths 13PE-001, 002, 003, 004 & 005 and emissions from operations outside the booths may be combined as a single data record.) The content and format of such records shall be arranged with the Director, West Central Regional Office. These records shall include, but are not limited to:

- 1. A record of the VOC content of each material used in the truck assembly and coating operation based on a certified environmental data sheet from the material vendor or testing of the material using an EPA approved testing methodology such as 40 CFR part 60, Appendix A EPA Reference Method 24 or equivilent.
- 2. Monthly and annual consumption of VOC for each operational area. Annual consumption and throughput shall be calculated monthly as the sum of the previous

Page 20

consecutive 12 month period.

- 3. Monthly and annual consumption of VOC for overall truck painting/coating. Annual consumption and throughput shall be calculated monthly as the sum of the previous consecutive 12 month period.
- 4. Monthly and annual consumption of gallons of paints/coatings for each operational area and for overall truck painting/coating. The waterborne/ exempt solvent paints/coatings shall be reported on both bases of with water and exempt solvent and less water and exempt solvents. Annual consumption shall be calculated monthly as the sum of the previous consecutive 12 month period.
- 5. Monthly and annual throughput of trucks for overall painting/coating. Annual throughput shall be calculated monthly as the sum of the previous consecutive 12 month period.
- 6. Monthly and annual emissions of VOC from overall truck painting/coating. Annual emissions shall be calculated monthly as the sum of the previous consecutive 12 month period.
- 7. Average monthly and annual VOC emissions in pounds/gallon as an average from overall truck painting/coating, except for spray booths controlled by VOC fume incineration, accounting for waterborne/exempt solvent paints/coatings on the bases of both "with water and exempt solvents" and "less water and exempt solvents." Annual emissions shall be calculated monthly as the sum of the previous consecutive 12 month period.
- 8. Records of the differential pressure readings for the venturi scrubbers controlling particulate emissions from the following spray booths: Chassis 1PE-002, Cab Prime 5PE-001, Special Projects 7PE-001, Cab Basecoat/Multi-Tone 8PE-001, Cab Basecoat/Multi-Tone 8PE-002, and Cab Clearcoat 9PE-001; and for the water curtain controlling particulate emissions from the Chassis 1PE-001 spray booth and differential pressure readings between the factory floor and Cab Basecoat/Multi-Tone 8PE-001 and Cab Basecoat/Multi-Tone 8PE-002 spray booths. Readings shall be recorded at least once per shift during process operations.
- 9. Records of the VOC concentration of the exhaust to atmosphere of the zeolite concentrator and records of the temperature of the incinerators controlling VOC emissions from Basecoat/Multi-Tone spray booths 8PE-001 and 8PE-002. Readings shall be recorded at least once per hour during process operations.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-50-50, 9 VAC 5-80-110 and/or Condition 26 of 2/26/03 Permit)

Effective Date: June 1, 2002; Revision Date: June 23, 2003

Page 21

D. Testing

1. **Testing/Monitoring Ports** - The permitted facility shall be constructed so as to allow for emissions testing upon reasonable notice at any time, using appropriate methods. Test ports shall be provided when requested at the appropriate locations or in accordance with the applicable performance specification (reference 40 CFR Part 60, Appendix B).

(9 VAC 5-50-30, 9 VAC 5-80-110, and Condition 32 of 2/26/03 Permit)

- 2. Stack Tests Upon request by the DEQ, but no less frequently than once in each 24 month period, the permittee shall conduct additional performance tests for the VOC and HAP destruction efficiency of the zeolite concentrator and incinerator controlling VOC and HAP emissions from the Basecoat/Multi-Tone 8PE-001 spray booth to demonstrate compliance with the emission limits and control efficiency requirements contained in this permit. The tests shall be performed, and demonstrate compliance, within 60 days after notice by the Director, West Central Regional Office, that the Department has reason to believe that the facility or a portion of the facility is not in compliance with the emission limits of this permit. Tests shall be conducted and reported and data reduced as set forth in 9 VAC 5-50-30 of State Regulations, and the test methods and procedures contained in each applicable section or subpart listed in 9 VAC 5-50-410. The details of the tests shall be arranged with the Director, West Central Regional Office. The permittee shall submit a test protocol at least 30 days prior to testing. Two copies of the test results shall be submitted to the Director, West Central Regional Office within 45 days after test completion and shall conform to the test report format enclosed with the New Source Review permit. (9 VAC 5-50-30 G, 9 VAC 5-80-110, and Condition 27 of 2/26/03 Permit)
- 3. **Stack Tests** At least once during the term of this permit and additionally upon request by the DEQ, the permittee shall conduct performance tests for the VOC and HAP destruction efficiency of the incinerator controlling VOC and HAP emissions from the Basecoat/Multi-Tone 8PE-002 spray booth to demonstrate compliance with the emission limits and control efficiency requirements contained in this permit. The tests shall be performed, and demonstrate compliance, within 60 days after notice by the Director, West Central Regional Office, that the Department has reason to believe that the facility or a portion of the facility is not in compliance with the emission limits of this permit. Tests shall be conducted and reported and data reduced as set forth in 9 VAC 5-50-30 of State Regulations, and the test methods and procedures contained in each applicable section or subpart listed in 9 VAC 5-50-410. The details of the tests shall be arranged with the Director, West Central Regional Office. The permittee shall submit a test protocol at least 30 days prior to testing. Two copies of the test results shall be submitted to the Director, West Central Regional Office within 45 days after test completion and shall conform to the test report format enclosed with The New Source Review permit.

(9 VAC 5-50-30 G, 9 VAC 5-80-110, and Condition 28 of 2/26/03 Permit)

Effective Date: June 1, 2002; Revision Date: June 23, 2003

Page 22

4. Stack Tests - Upon request by the DEQ, the permittee shall conduct performance tests for the VOC destruction efficiency of the incinerator controlling VOC emissions from the E-Coat Oven (3FBE-001) to demonstrate compliance with the emission limits and control efficiency requirements contained in this permit. The tests shall be performed, and demonstrate compliance, within 60 days after notice by the Director, West Central Regional Office, that the Department has reason to believe that the facility or a portion of the facility is not in compliance with the emission limits of this permit. Tests shall be conducted and reported and data reduced as set forth in 9 VAC 5-50-30 of State Regulations, and the test methods and procedures contained in each applicable section or subpart listed in 9 VAC 5-50-410. The details of the tests shall be arranged with the Director, West Central Regional Office. The permittee shall submit a test protocol at least 30 days prior to testing. Two copies of the test results shall be submitted to the Director, West Central Regional Office within 45 days after test completion and shall conform to the test report format enclosed with the New Source Review permit.

(9 VAC 5-50-30 G, 9 VAC 5-80-110, and Condition 29 of 2/26/03 Permit)

- 5. **Stack Tests** At least once during the term of this permit and additionally upon request by the DEQ (on a booth specific basis), the permittee shall conduct performance tests for the particulate emissions from spraying or coating in each spray booth to demonstrate compliance with the emission limits and control efficiency requirements contained in this permit. The tests shall be performed, and demonstrate compliance, within 60 days after notice by the Director, West Central Regional Office, that the Department has reason to believe that the facility or a portion of the facility is not in compliance with the emission limits of this permit. Tests shall be conducted and reported and data reduced as set forth in 9 VAC 5-50-30 of State Regulations, and the test methods and procedures contained in each applicable section or subpart listed in 9 VAC 5-50-410. The details of the tests shall be arranged with the Director, West Central Regional Office. The permittee shall submit a test protocol at least 30 days prior to testing. Two copies of the test results shall be submitted to the Director, West Central Regional Office within 45 days after test completion and shall conform to the test report format enclosed with the New Source Review permit. (9 VAC 5-50-30 G, 9 VAC 5-80-110, and Condition 30 of 2/26/03 Permit)
- 6. **Visible Emissions Evaluation** Upon request by the DEQ, the permittee shall conduct additional visible emission evaluations in accordance with 40 CFR, Part 60, Appendix A, Method 9 on any spray operation stack(s) to demonstrate compliance with the visible emission limits contained in this permit. Each test shall consist of three (3) sets of twenty-four (24) consecutive observations (at fifteen (15) second intervals) to yield a six (6) minute average. The details of the tests are to be arranged with Director, West Central Regional Office. The tests shall be performed, and demonstrate compliance, within 60 days after notice by the Director, West Central Regional Office, that the Department has reason to believe that the facility or a portion of the facility is not in compliance with the emission limits of this permit. Two (2) copies of the test results shall be submitted to the Director, West Central

Effective Date: June 1, 2002; Revision Date: June 23, 2003

Page 23

Regional Office within 45 days after test completion and shall conform to the test report format enclosed with the New Source Review permit. (9 VAC 5-50-30 G, 9 VAC 5-80-110, and Condition 31 of 2/26/03 Permit)

7. **Test Methods** - If testing to demonstrate compliance is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
VOC	EPA Methods 18, 25, 25a or other method approved by DEQ
VOC Content	EPA Methods 24, 24a or other method approved by DEQ
PM/PM-10	EPA Method 5, 17 or other method approved by DEQ
Visible Emission	EPA Method 9

(9 VAC 5-80-110)

E. Reporting

The reporting requirements for this section are satisfied by the recordkeeping requirements in this section and the General Conditions section.

Permit Number: VA-20765

Effective Date: June 1, 2002; Revision Date: June 23, 2003

Page 24

V. Facility Wide Conditions

A. Limitations

1. **Plantwide Emission Limits** - Total emissions from the facility, including all truck painting/ coating and all miscellaneous sources, shall not exceed the limits specified below:

Volatile Organic Compounds 493.5 tons/yr

Annual emissions calculated monthly as the sum of the previous consecutive twelve month period.

(9 VAC 5-80-110, 9 VAC 5-50-260, and Condition 24 of 2/26/03 Permit)

2. **Material Storage** - The permittee is authorized to store petroleum diesel fuel, petroleum lubricant oil, solvent/thinner, and antifreeze in the storage tanks listed as insignificant sources below. A change in the materials stored may require a permit to modify and operate, as well as a revision of this permit.

(9 VAC 5-80-110, 9 VAC 5-20-80, and Condition 3 of 2/26/03 Permit)

3. **Requirements by Reference** - Permittee shall comply with all applicable provisions of 40 CFR 60.110b to 60.117b [NSPS Kb]. At the time of issuance of this permit, this requires that the permittee shall keep readily accessible records showing the dimensions of storage vessels subject to the regulation and an analysis showing the capacity of those storage vessels. These records shall be kept for the life of the storage vessels.

(9 VAC 5-80-110, 9 VAC 5-50-410, and Condition 4 of 2/26/03 Permit)

- 4. **Notification for Control Equipment Maintenance** The permittee shall furnish notification to the Director, West Central Regional Office of the intention to shut down or bypass, or both, air pollution control equipment for necessary scheduled maintenance, which results in excess emissions for more than one hour, at least 24 hours prior to the shutdown. The notification shall include, but is not limited to, the following information:
 - a. Identification of the air pollution control equipment to be taken out of service, as well as its location, and registration number;
 - b. The expected length of time that the air pollution control equipment will be out of service;
 - c. The nature and quantity of emissions of air pollutants likely to occur during the shutdown period;

Effective Date: June 1, 2002; Revision Date: June 23, 2003

Page 25

d. Measures that will be taken to minimize the length of the shutdown or to negate the effect of the outage.

(9 VAC 5-80-110, 9 VAC 5-20-180 B, and Condition 35 of 2/26/03 Permit)

- 5. **Violation of Ambient Air Quality Standard** The permittee shall, upon request of the DEQ, reduce the level of operation or shut down a facility, as necessary to avoid violating any primary ambient air quality standard and shall not return to normal operation until such time as the ambient air quality standard will not be violated. (9 VAC 5-80-110, 9 VAC 5-20-180 I, and Condition 37 of 2/26/03 Permit)
- 6. **Maintenance/Operating Procedures** The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment and process equipment which affect such emissions:
 - a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
 - b. Maintain an inventory of spare parts.
 - c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
 - d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request. (9 VAC 5-80-110, 9 VAC 5-50-20 E, 9 VAC 5-80-110, and Condition 38 of 2/26/03 Permit)

B. Monitoring

1. The permittee shall conduct a weekly observation of the facility including the VOC incinerators and all spray booth stacks during operation of the incinerators and spray booths using a 40 CFR 60 Appendix A Method 22 evaluation. If any visible emission is observed, the condition shall be corrected as soon as possible, such that no visible emissions exist, and recorded or a 40 CFR 60 Appendix A Method 9 evaluation shall be performed to determine if the opacity source is in compliance with the conditions of this permit. If a spray booth does not operate during a weekly period, this shall be noted on the reports of this monitoring activity.

(9 VAC 5-80-110)

Page 26

C. Recordkeeping

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, West Central Regional Office. These records shall include, but are not limited to:

- 1. A record of the VOC content of each material used in the truck assembly and coating operation based on a certified environmental data sheet from the material vendor or testing of the material using an EPA approved testing methodology such as 40 CFR part 60, Appendix A EPA Reference Method 24 or equivilent.
- 2. Monthly and annual consumption of all miscellaneous VOC sources other than truck painting/coating for the total plant. Annual consumption shall be calculated monthly as the sum of the previous consecutive 12 month period.
- 3. Monthly and annual consumption of all VOC combined for the total plant. Annual consumption shall be calculated monthly as the sum of the previous consecutive 12 month period.
- 4. Monthly and annual VOC emissions of all miscellaneous VOC sources for the total plant. Annual emissions shall be calculated monthly as the sum of the previous consecutive 12 month period.
- 5. Monthly and annual emissions of VOC from the total plant (painting/coating and all other miscellaneous sources). Annual emissions shall be calculated monthly as the sum of the previous consecutive 12 month period.
- 6. Monthly and annual emissions from the total plant of all Hazardous Air Pollutants emitted from production related activities including, but not limited to, 2-butoxyethanol and total glycol ethers, methyl ethyl ketone, methyl isobutyl ketone, xylene, toluene, methanol, ethylbenzene, hexamethylene 1,6 diisocyanate, formaldehyde, lead from lead chromate, chromium from lead chromate, and antimony. Annual emissions shall be calculated monthly as the sum of the previous consecutive 12 month period.
- 7. Weekly records of required opacity evaluations including all Method 22 evaluations, all Method 9 evaluations, all malfunction adjustments associated with opacity observations, and a record of any spray booths which did not operate during the weekly evaluation period.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-50-50, 9 VAC 5-80-110 and/or Condition 26 of 2/26/03 Permit)

Page 27

D. Testing

1. The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.

(9 VAC 5-50-30, 9 VAC 5-80-110, and Condition 32 of 2/26/03 Permit)

2. If testing to demonstrate compliance is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
VOC	EPA Methods 18, 25, 25a or other method approved by DEQ
VOC Content	EPA Methods 24, 24a or other method approved by DEQ
PM/PM-10	EPA Method 5, 17 or other method approved by DEQ
Visible Emission	EPA Method 9

(9 VAC 5-80-110)

E. Reporting

The reporting requirements for this section are satisfied by the recordkeeping requirements in this section and the General Conditions section.

Page 28

VI. Insignificant Emission Units

The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
FBAD-1	Cleaver Brooks boiler, Model CB-60HP, n.g.	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	2,500,000 BTU/hr
FBAD-2	Lochinvar water heater, CNA 726-080- 0F9, n.g.	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	725,000 BTU/hr
FBBIW2A, FBBIW2B	Two PVI Water Heaters, n.g	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	399,000 BTU/hr each
FBBIW1A FBBIW1H	Eight HV Space Heating Units, n.g.	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	3,000,000 BTU/hr each
WELD	Portable welders for equipment maintenance	9 VAC 5-80-720A	PM, CO, SO ₂ , NO _X	NA
PW1-PW5	Five cold cleaner parts washers	9 VAC 5-80-720B	VOC	VOC < 5 tpy
PMSB-1	One small paint spray booth for test panels	9 VAC 5-80-720B	VOC	VOC < 5 tpy
PMBT1-8	Eight 175 gallon bulk tanks for paint/solvent	9 VAC 5-80-720B	VOC	VOC < 5 tpy
FBAB1A – FBAB1I	Nine Door Heaters	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	475,200 BTU/hr to 1,900,800 BTU/hr
FBAB2A- FBAB2CC	Twenty-Nine HV Space Heating Units, n.g.	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	302,400 BTU/hr to 3,460,000 BTU/hr
FBAB3A, FBAB3B	Two Air Houses for space heating, n.g.	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	6,804,000 BTU/hr each
FBAB4	Assembly Bldg Boiler	9 VAC 5-80-720C	PM , CO , VOC , SO_2 , NO_X	3,600,000 BTU/hr
FBAB5A- FBAB5F	Six MAU Space Heating Units, n.g.	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	3,024,000 BTU/hr each
FBAB6A, FBAB6B	Two MAU Space Heating Units, n.g.	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	1,814,400 BTU/hr each
FBSB1A, FBSB1B	Two HV Space Heating units, n.g.	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	3,456,000 BTU/hr total
FBWTB	Dyno Water Test Unit	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	388,800 BTU/hr
FBPC1A – FBPC1D	Four HV Space Heating units, n.g.	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	8,294,400 BTU/hr total
FBPC2A- FBPC2F	Six IR Door Heaters, unvented	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	75,000 BTU/hr each
FBPC3A, FBPC3B	Two HV Unit MUA 021, 022	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	2.203 MMBTU/hr each

Emission	Emission Unit		Pollutant(s) Emitted	Rated Capacity
Unit No.	Description	Citation	(9 VAC 5-80-720 B)	(9 VAC 5-80-720 C)
FBPC4	Old Chassis Booth MUA 023	9 VAC 5-80-720C	PM, CO, VOC, SO_2, NO_X	5.5 MMBTU/hr
FBPC5A-	Eleven Dravo Door	Door		475,200 BTU/hr –
FBPC5L	Heaters	9 VAC 5-80-720C	PM, CO, VOC, SO_2, NO_X	1,900,800 BTU/hr
FBPC6	One ENG-A HV unit	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	2.112 MMBTU/hr
FBDF1A – FBDF1O	Fifteen IR Door Heaters (vented)	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	75,000 BTU/hr each
FBDF2A, FBDF2B	Two Building MUA	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	4.0 MMBTU/hr each
WWTP-1, WWTP-2	Two waste water treatment plants - batch	9 VAC 5-80-720B	VOC	VOC < 5 tpy
WWTF1A- WWTF1C	Three Building Gas Unit Heaters	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	150,000 BTU/hr each
WWTF2	One Office HVAC	9 VAC 5-80-720C	PM, CO, VOC, SO_2, NO_X	45,000 BTU/hr
BIWW1A- BIWW1M	Thirteen IR Door Heaters (vented)	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	75,000 BTU/hr each
BIWW2A- BIWW2I	Nine Building MUA	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	2.25 MMBTU/hr each
ASW1A – ASW1CC	Twenty-Nine IR Door Heaters (vented)	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	75,000 BTU/hr each
ASW2	One HVAC Unit	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	250,000 BTU/hr
ASW3A – ASW3L	Twelve Building MUA	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	2.25 MMBTU/hr each
FBNBW1	HV Unit, n.g	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	625,000 BTU/hr
FBNBW2	HV Unit, n.g	9 VAC 5-80-720C	PM, CO, VOC, SO_2, NO_X	842,000 BTU/hr
FBNBW3	Trane HV Unit, n.g	9 VAC 5-80-720C	PM , CO , VOC , SO_2 , NO_X	500,000 BTU/hr
FBNWB4A FBNWB4C	Three Trane HV Units, n.g.	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	250,000 BTU/hr each
FBNWB5A FBNWB5H	Eight dock heaters n.g.	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	91,200 BTU/hr each
FBNWB6A FBNWB6H	Eight MUA 002-009	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	3.127 MMBTU/hr each
FBNWB7A FBNWB7H	Eight HV Units 013- 020	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	5.5 MMBTU/hr each
FBNWB8A FBNWB8C	Three HV Units 010- 012	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	4.59 MMBTU/hr each
FBNWB9	One HV Unit 024	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	3.4 MMBTU/hr
FBNWB10 A&B	Two 40 ton HVAC Units	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	1.062 MMBTU/hr each
FBNWB11	One 60 ton HV Unit	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	885,000 BTU/hr
FBNWB12 A-D	Four PAC units	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	123,600 BTU/hr to 545,900 BTU/hr
FBNWB13 A&B	Two water heaters	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	412,000 BTU/hr each

Page 30

Emission	Emission Unit		Pollutant(s) Emitted	Rated Capacity
Unit No.	Description Description	Citation	(9 VAC 5-80-720 B)	(9 VAC 5-80-720 C)
FBNWB14	Description	(9 VAC 5-80-720)		1.318 MMBTU/hr -
A, B & C	Three PAC Units	C Units 9 VAC 5-80-720C PM, CO, VOC, SO ₂ ,		1.54 MMBTU /hr
FBNWB15				64,890 BTU/hr to
A, B & C	Three PAC Units	9 VAC 5-80-720C	PM, CO, VOC, SO_2, NO_X	735,420 BTU /hr
FBNWB16 A-O	Fifteen Door Heaters	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	77,250 BTU/hr each
FBNWB17	Two Paint Dock Door	0.1/4.0.5.00.7200	DM CO VOC SO NO	226,000 BTU/hr
A & B	Heaters	9 VAC 5-80-720C	PM, CO, VOC, SO_2, NO_X	each
FBNWB18	One Door Heater	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	875,000 BTU/hr
FBNWB19	Two Direct Fired	9 VAC 5-80-720C	DM CO VOC SO NO	8.24 MMBTU/hr
A & B	Burners	9 VAC 5-80-720C	PM, CO, VOC, SO_2, NO_X	each
FBNWB20	One MUA	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	659,200 BTU/hr
FORKLIFT	Forty-Two Gas Powered Forklifts	9 VAC 5-80-720A	PM, CO, VOC, NO _X	NA
PDSL001	Diesel Fuel Tank	9 VAC 5-80-720B	VOC	VOC < 5 tpy
EGEN	Emergency Generator, diesel	9 VAC 5-80-720C	PM, CO, VOC, SO ₂ , NO _X	150 KW (201 bhp)
GEN0001	Diesel Fuel Tank	9 VAC 5-80-720B	VOC	VOC < 5 tpy
AST-101	SCH 50 Wt Oil Tank	9 VAC 5-80-720B	VOC	VOC < 5 tpy
AST-102	Transmission Fluid Tank	9 VAC 5-80-720B	VOC	VOC < 5 tpy
AST-103	Anti-Freeze Tank	9 VAC 5-80-720B	VOC	VOC < 5 tpy
AST-104	15W40 Oil Tank	9 VAC 5-80-720B	VOC	VOC < 5 tpy
AST-105	75W90 storage tank, aluminum, heat-traced	9 VAC 5-80-720B	VOC	VOC < 5 tpy
AST-106	Freon 134A Tank	9 VAC 5-80-720B	VOC	VOC < 5 tpy
AST-107	Methanol Tank	9 VAC 5-80-720B	VOC	VOC < 5 tpy
AST-108	Diesel Fuel Tank	9 VAC 5-80-720B	VOC	VOC < 5 tpy
AST-201	Purge Solvent Tank	9 VAC 5-80-720B	VOC	VOC < 5 tpy
AST-202	Paint Waste Tank	9 VAC 5-80-720B	VOC	VOC < 5 tpy
AST-301	Gasoline storage tank, 550 gal near PC bldg	9 VAC 5-80-720B	VOC	VOC < 5 tpy
AST-401 –	Eight 30,000 gallon	0.1/4.0 5.00.7000	MOC	MOC 45 tons
AST-408	propane storage tanks	9 VAC 5-80-720B	VOC	VOC < 5 tpy
AST-501	Diesel Fuel Tank	9 VAC 5-80-720B	VOC	VOC < 5 tpy
AST-502	Diesel Fuel Tank	9 VAC 5-80-720B	VOC	VOC < 5 tpy

These insignificant emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Page 31

VII. Permit Shield & Streamlined Requirements

Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been identified as being alternately satisfied by this permit:

Citation	Title of Citation	Description of Streamline
9 VAC 5-40-900	Particulate Matter Standard for	Conditions III-A-1 and III-A-6
	Fuel Burning Equipment	insure that equipment cannot
		exceed this emission standard
9 VAC 5-40-930	Sulfur Dioxide Standard for Fuel	Conditions III-A-1 and III-A-6
	Burning Equipment	insure that equipment cannot
		exceed this emission standard

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law. (9 VAC 5-80-140)

Permit Number: VA-20765

Effective Date: June 1, 2002; Revision Date: June 23, 2003

Page 32

VIII. General Conditions

A. Federal Enforceability

All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.

(9 VAC 5-80-110 N)

B. Permit Expiration

This permit shall become invalid five years from the date of issuance. The permittee shall submit an application to Director, West Central Regional Office for renewal of this permit no earlier than 18 months and no later than six months prior to the date of expiration of this permit. Upon receipt of a complete and timely application for renewal, this source may continue to operate subject to final action by the DEQ on the renewal application.

(9 VAC 5-80-110 D and 9 VAC 5-80-80 F)

C. Recordkeeping and Reporting

- 1. All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:
 - a. The date, place as defined in the permit, and time of sampling or measurements.
 - b. The date(s) analyses were performed.
 - c. The company or entity that performed the analyses.
 - d. The analytical techniques or methods used.
 - e. The results of such analyses.
 - f. The operating conditions existing at the time of sampling or measurement.

(9 VAC 5-80-110 F)

Page 33

- 2. Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. (9 VAC 5-80-110 F)
- 3. The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than <u>March 1</u> and <u>September 1</u> of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G. [Note that much of the recordkeeping required by this permit also serves as required periodic monitoring to determine emissions compliance and therefore needs to be addressed in the periodic reports.] The details of the reports are to be arranged with the Director, West Central Regional Office. The reports shall include:
 - a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.
 - b. All deviations from permit requirements. For purposes of this permit, deviations include, but are not limited to:
 - (1) Exceedance of emissions limitations or operational restrictions;
 - (2) Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or compliance assurance monitoring which indicates an exceedance of emission limitations or operational restrictions; or,
 - (3) Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.
 - c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi-annual reporting period."
 - d. The report shall be sent to the following address:

VA DEQ Director, West Central Regional Office ATTN: Air Compliance Manager 3019 Peters Creek Road Roanoke, VA 24019

Page 34

D. Annual Compliance Certification

Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and to DEQ no later than March 1 each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

- 1. The time period included in the certification. The time period to be addressed is January 1 to December 31.
- 2. The identification of each term or condition of the permit that is the basis of the certification.
- 3. The compliance status.
- 4. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.
- 5. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.
- 6. Such other facts as the permit may require to determine the compliance status of the source.

This annual compliance certification shall be sent to the following addresses:

Director, West Central Regional Office Attn: Air Compliance Manager Virginia DEQ 3019 Peters Creek Road Roanoke, VA 24019

Clean Air Act Title V Compliance Certification (3AP00) U. S. Environmental Protection Agency, Region III 1650 Arch Street Philadelphia, PA 19103-2029.

Page 35

E. Permit Deviation Reporting

The permittee shall notify the Director, West Central Regional Office, within four (4) daytime business hours of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the occurrence, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next quarterly or semi-annual compliance monitoring report required by this permit.

(9 VAC 5-80-110 F.2 and 9 VAC 5-80-250)

F. Failure/Malfunction Reporting

If, for any reason, the affected facilities or related air pollution control equipment fails or malfunctions and may cause excess emissions for more than one hour, the owner shall notify the Director, West Central Regional Office, within four (4) daytime business hours of the occurrence. In addition, the owner shall provide a written statement, within 14 days, explaining the problem, corrective action taken, and the estimated duration of the breakdown/shutdown. The opacity limits in this permit apply at all times except during periods of startup, shutdown, malfunction and as otherwise provided in this permit. (9 VAC 5-80-250)

G. Startup, Shutdown, and Malfunction

At all times, including periods of startup, shutdown, soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

The opacity limits in this permit apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in this permit. (9 VAC 5-50-20, 9 VAC 5-40-20)

H. Malfunction as an Affirmative Defense

1. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the conditions of paragraph 2 are met.

Effective Date: June 1, 2002; Revision Date: June 23, 2003

Page 36

- 2. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:
 - a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.
 - b. The permitted facility was at the time being properly operated.
 - c. During the period of malfunction, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit.
 - d. For malfunctions that occurred for one hour or more, the permittee submitted to the Board by the deadlines described in **Failure/Malfunction Reporting** above, a notice and written statement containing a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notice fulfills the requirement of 9 VAC 5-80-110 F.2.b to report promptly deviations from permit requirements.
- 3. In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any requirement applicable to the source.

(9 VAC 5-80-250)

I. Fugitive Dust Emission Standards

During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:

- 1. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;
- 2. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;

Page 37

- 3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or other similar operations;
- 4. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion: and.
- 5. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9 VAC 5-40-90 and 9 VAC 5-50-90)

J. Severability

The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.

(9 VAC 5-80-110 G.1)

K. Duty to Comply

The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.

(9 VAC 5-80-110 G.2)

L. Need to Halt or Reduce Activity not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(9 VAC 5-80-110 G.3)

M. Permit Action for Cause

1. This permit may be modified, revoked, reopened, and reissued, or terminated for cause as specified in 9 VAC 5-80-110 L, 9 VAC 5-80-240 and 9 VAC 5-80-260. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (9 VAC 5-80-110 G.4)

Permit Number: VA-20765

Effective Date: June 1, 2002; Revision Date: June 23, 2003

Page 38

2. Such changes that may require a permit modification and/or revisions include, but are not limited to, the following:

- a. Erection, fabrication, installation, addition, or modification of an emissions unit (which is the source, or part of it, which emits or has the potential to emit any regulated air pollutant), or of a source, where there is, or there is potential of, a resulting emissions increase;
- b. Reconstruction or replacement of any emissions unit or components thereof such that its capital cost exceeds 50% of the cost of a whole new unit;
- c. Any change at a source which causes emission of a pollutant not previously emitted, an increase in emissions, production, throughput, hours of operation, or fuel use greater than those allowed by the permit, or by 9 VAC 5-80-11, unless such an increase is authorized by an emissions cap; or any change at a source which causes an increase in emissions resulting from a reduction in control efficiency, unless such an increase is authorized by an emissions cap;
- d. Any reduction of the height of a stack or of a point of emissions, or the addition of any obstruction which hinders the vertical motion of exhaust;
- e. Any change at the source which affects its compliance with conditions in this permit, including conditions relating to monitoring, recordkeeping, and reporting;
- f. Addition of an emissions unit which qualifies as insignificant by emissions rate (9 VAC 5-80-720 B) or by size or production rate (9 VAC 5-80-720 C);
- g. Any change in insignificant activities, as defined by 9 VAC 5-80-90 D.1.a(1) and 9 VAC 5-80-720 B and 9 VAC 5-80-720 C.

(9 VAC 5-80-110 G, 9 VAC 5-80-110 J, 9 VAC 5-80-240, and 9 VAC 5-80-260)

N. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege. (9 VAC 5-80-110 G.5)

Page 39

O. Duty to Submit Information

- The permittee shall furnish to the Board, within a reasonable time, any information
 that the Board may request in writing to determine whether cause exists for
 modifying, revoking and reissuing, or terminating the permit or to determine
 compliance with the permit. Upon request, the permittee shall also furnish to the
 Board copies of records required to be kept by the permit and, for information
 claimed to be confidential, the permittee shall furnish such records to the Board along
 with a claim of confidentiality.
 (9 VAC 5-80-110 G.6)
- 2. Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G. (9 VAC 5-80-110 K.1)

P. Duty to Pay Permit Fees

The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-305 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-355. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by **April 15** of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department. (9 VAC 5-80-110 H and 9 VAC 5-80-340 C)

Q. Alternative Operating Scenarios

Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1. (9 VAC 5-80-110 J)

R. Inspection and Entry Requirements

The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

Page 40

- 1. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
- 2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.
- 3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
- 4. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K.2)

S. Reopening For Cause

The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F.

- 1. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- 2. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- 3. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

(9 VAC 5-80-110 L)

T. Permit Availability

Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.

(9 VAC 5-80-150 E)

Page 41

U. Transfer of Permits

- 1. No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another. (9 VAC 5-80-160)
- 2. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200. (9 VAC 5-80-160)
- 3. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200. (9 VAC 5-80-160)

V. Permit Revocation or Termination for Cause

A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe, any permit for any of the grounds for revocation or termination or for any other violations of these regulations. (9 VAC 5-80-260)

W. Duty to Supplement or Correct Application

Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit. (9 VAC 5-80-80 E)

X. Stratospheric Ozone Protection

If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F. (40 CFR Part 82, Subparts A-F)

Permit Number: VA-20765

Effective Date: June 1, 2002; Revision Date: June 23, 2003

Page 42

Y. Accidental Release Prevention

If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68. (40 CFR Part 68)

Z. Changes to Permits for Emissions Trading

No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (9 VAC 5-80-110 I)

AA. Emissions Trading

Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:

- 1. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.
- 2. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.
- 3. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.

(9 VAC 5-80-110 I)